

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SAUDDY NOEMI HERNANDEZ ONEILL
JOAN LAUREANO COLON

DEBTORS

CASE NO. 19-06674 EAG

CHAPTER 13

**MOTION REQUESTING AUTHORIZATION TO WITHDRAW
AND RESIGN AS COUNSEL FOR DEBTORS**

TO THE HONORABLE COURT:

COMES NOW, **ROBERTO FIGUEROA-CARRASQUILLO**, attorney of record for the Debtors **Sauddy Noemi Hernandez Oneill and Joan Laureano Colon**, the Debtors in the above captioned case, and very respectfully states and prays as follows:

1. That the above captioned case was filed on November 14, 2019, under Chapter 13 of the Bankruptcy Code and the Debtors' proposed Chapter 13 Plan was confirmed on May 07, 2020 as per *Order Confirming Plan* (Docket No. 23).

2. That upon agreement of the Debtors and the undersigned attorney, they have agreed to request his (the undersigned attorney's) resignation as counsel for the Debtors, to allow the Debtors to obtain new legal representation, in the above captioned case. The Debtors are legally married but are presently separated, and they wish to obtain individual and separate legal representation, in the above captioned case.

3. Therefore, the undersigned attorney respectfully requests the Court to Order the resignation of Roberto Figueroa Carrasquillo as counsel for the Debtors, in the above captioned case.

4. A copy of the original case file will be returned to the Debtors within the next seven (7) days.

5. The separate postal addresses of the Debtors are:

Sauddy Noemi Hernandez Oneill
RR-01 Buzon 13008
Bo Bucarabones
Toa Alta PR 00953

Joan Laureano Colon
RR-6 Box 6936
Toa Alta PR 00953

6. As to the status of the present case, on June 14, 2024, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss* (Docket No. 55) for failure to maintain current Plan payments and on July 18, 2024 the Court issued an *ORDER* (Docket No. 56) to the Debtors' undersigned attorney Ordering said attorney to reply within 21 days as to the *Trustee's Motion to Dismiss* (Docket No. 55).

7. The Debtors hereby respectfully request this Honorable Court to grant the present motion and grant the Debtors thirty (30) days within to notify their new legal representation.

WHEREFORE, Roberto Figueroa-Carrasquillo respectfully requests the Court grant the resignation of the undersigned attorney as attorney for the Debtors in the present case.

I CERTIFY that the present motion has been filed using the CM/ECF system which will send notification of same to: the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq., Monsita Lecaroz Arribas, Esq. Assistant US Trustee; and that I have sent via regular mail a copy of this motion to the Debtor

Sauddy Noemi Hernandez Oneill, RR-01 Buzon 13008 Bo Bucarabones Toa Alta PR 00953 and to the Joint-Debtor Joan Laureano Colon, RR6 Box 6936 Toa Alta PR 00953, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 31st day of July, 2024.

/s/Roberto Figueroa Carrasquillo
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